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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 STEVEN LYNN TURNER, an individual,  
11 Plaintiff,  
12 vs.

13 GEICO ADVANTAGE INSURANCE  
COMPANY, a foreign corporation; DOES  
14 I through X, inclusive and ROE  
BUSINESS ENTITIES I through X,  
15 inclusive,  
16 Defendant.

CASE NO.: 2:21 -cv-00592-JCM-DJA  
**STIPULATION AND ORDER TO  
EXTEND DISCOVERY & REQUEST FOR  
SETTLEMENT CONFERENCE**  
**(Second Request)**

17 Defendant GEICO ADVANTAGE INSURANCE COMPANY, by and through its  
18 attorneys, Thomas E. Winner & Matthew J. Douglas of the law firm WINNER BOOZE &  
19 ZARCONE, and Plaintiff STEVEN LYNN TURNER, by and through his attorneys, Carl R.  
20 Houston, of the LADAH LAW OFFICE, hereby submit the following Stipulation and (Proposed)  
21 Order to Extend Discovery pursuant to LR 26-4 LR IA 6-1 and to request a settlement  
22 conference with the Magistrate Judge pursuant to LR 16-5.

23 This is the second stipulation for an extension of discovery deadlines.

24 **A. Discovery Completed**

25 Plaintiff has served his initial disclosure of witnesses and documents and supplemented it  
26 twice.

27 Defendant has served its initial disclosure of witnesses and documents. It has been  
28 supplemented four times.

1 Plaintiff has disclosed treating (non-retained) medical expert witnesses and expert  
2 medical witness. Defendant has disclosed retained medical expert witness and a retained  
3 biomechanical/accident reconstruction expert.

4 Defendant has served one set of Interrogatories and one set of Requests for the  
5 Production of Documents to Plaintiff, which have been answered.

6 Plaintiff has served one set of Interrogatories, one set of Requests for the Production of  
7 Documents to Defendant, which have been answered.

8 Defendant has collected numerous medical records for Plaintiff and subpoenaed other  
9 records

10 Plaintiff TURNER has been deposed.

11 Defendant has deposed Plaintiff's treating provider, Dr. Stuart Kaplan.

12 **B. Discovery that Remains to Be Completed**

13 Defendant seeks the depositions of Plaintiff's treating provider/experts Dr. Kevin Sharif.  
14 Plaintiff seeks depose the Defendant's experts and Rule 30(b)(6) corporate designee.

15 **C. The Reasons Why Discovery Was Not Completed In the Time Limits Set by the**  
16 **Discovery Plan**

17 Defendant has had difficulty getting dates for Dr. Kevin Sharif depositions due to the  
18 doctor's schedule<sup>1</sup>. Additionally, Plaintiff's seek to depose defense experts and defendant's  
19 corporate designee. However, due to the physicians' schedules, the trial calendar for Plaintiff's  
20 counsel, and upcoming holidays, the parties realized that they will be unable to complete these  
21 depositions within the current discovery time frame, which ends January 7, 2022.

22 Moreover, recently the parties have engaged in fruitful settlement discussions and believe  
23 a settlement conference with the Magistrate Judge would be beneficial. The parties desire to  
24 attempt settlement before expending more costs for provider and expert depositions.

25 As such, the parties request a 90 day extension of the current discovery closure deadline  
26 and request a settlement conference with the Magistrate Judge pursuant to LR 16-5.

27 **Proposed Schedule for Completing Discovery**

The parties propose to complete discovery on the following deadlines:

- Discovery Cut-Off: Friday, April 7, 2022
- Deadline to Amend Pleadings or Add Parties: Closed
- Deadline to Disclose Initial Experts: Closed
- Deadline to Disclose Rebuttal Experts: Closed
- Deadline to File Dispositive Motions: Monday, May 9, 2022
- Deadline to Joint Pre-Trial Order Thursday June 9, 2022

Dated: December 27, 2021

WINNER BOOZE & ZARCONE

/s/ Matthew J. Douglas

Matthew J. Douglas, Esq.  
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Attorneys for Defendant GEICO

Dated: December 27, 2021

LADAH LAW OFFICE

/s/ Carl R. Houston

Carl R. Houston, Esq.  
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517 S. Third St.  
Las Vegas, NV 89101  
Attorneys for Plaintiff

**ORDER**

Having reviewed the parties' Stipulation to Extend Discovery (ECF No. 15) and Stipulation for Settlement Conference (ECF No. 19), the Court finds good cause to GRANT the stipulations. The Court will enter a separate order scheduling the settlement conference. IT IS SO ORDERED.

DATED this 6th day of January, 2022.



U.S. MAGISTRATE JUDGE